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11 Attorneys for Plaintiff
12 United States of America

13 UNITED STATES DISTRICT COURT

14 SOUTHERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 12cv0290-LAB(BLM)
16 Plaintiff,)
17 v.) JOINT MOTION FOR
18 \$18,467.00 IN U.S. CURRENCY,) JUDGMENT OF FORFEITURE
19 Defendant.)
20 _____)

21 The United States of America, by and through its counsel, Laura E. Duffy, United States
22 Attorney, and Michael P. Running, Jr., Special Assistant U.S. Attorney, and claimant, John
23 Dixon II, through his attorney of record Richard M. Barnett, agree as follows:

24 1. The parties have entered into this joint motion in order to resolve the matter of the
25 seizure and forfeiture of the above-referenced defendant, \$18,467.00 in U.S. Currency ("defendant
26 currency").

27 2. The parties have agreed to a settlement which is hereinafter described in its
28 particulars.

29 3. \$3,467.00 of the defendant currency shall be forfeited and condemned to the
30 United States pursuant to Title 21, United States Code, Section 881. \$15,000.00 of the defendant
31 currency, less any debt owed to the United States, any agency of the United States, or any other
32 debt in which the United States is authorized to collect, shall be returned to the claimant, John
33 Dixon II, either directly or through his attorney of record Richard M. Barnett.

1 4. The terms of this settlement do not affect the tax obligations, fines, penalties, or any
2 other monetary obligations the claimant owes to the United States.

3 5. The person or persons who made the seizure or the prosecutor shall not be liable to
4 suit or judgment on account of such seizure in accordance with Title 28, United States Code,
5 Section 2465. Claimant agrees that by entering into this joint motion, he has not "substantially
6 prevailed" within the meaning of 28 U.S.C. § 2465. All parties shall bear their own costs and
7 expenses, including attorney's fees. Judgment shall be entered in favor of the United States on its
8 complaint.

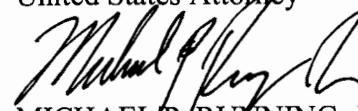
9 6. Claimant warrants and represents as a material fact that he is the sole owner of the
10 defendant currency and further warrants that no other person or entity has any right, claim or
11 interest in the defendant, and that he will defend and indemnify the United States against any and
12 all claims made against it on account of the seizure and forfeiture of the defendant currency.

13 7. The claimant, his agents, employees, or assigns, shall hold and save harmless the
14 United States of America, its agents and employees, from any and all claims which might result
15 from the seizure of the defendant currency.

16 8. Upon order of the Court, this case shall be closed.

18 DATED: *24 July 2012*

19 LAURA E. DUFFY
20 United States Attorney

21 
22 MICHAEL P. RUNNING, JR.
23 Special Assistant U.S. Attorney

24 DATED: *7-19-2012*

25 
26 JOHN DIXON II
27 Claimant

28 DATED: *7-19-12*

29 
30 RICHARD M. BARNETT
31 Attorney for Claimant